

HSAC feels that as promised by the FAA years ago, the Helicopter industry should have a regulation by its self that outlines the requirements for helicopters to operate commercially both scheduled and private charter.

Helicopters are unique in how they operate and this should be reflected in the regulations under which they have to operate.

If this can not be done at this time, we feel the following FAR Part 135 sections require rewriting to bring up them to date:

135.113

135.115 include (b) is qualified under this part in the aircraft,

135.119 (??? TSA requirements)

135.150a(7) (insert a date)

135.152(a) needs to add verbiage that allows aircraft usage in 135 operations when a digital flight recorder is not available and would be cost prohibited to certify.

(k) Add Sikorsky Helicopter SK61 Bell Helicopter BH214ST, Sikorsky S76A,A+,A++

135.153 and 154 should be combined.

135.159(a)(3)

135.165 (b) (4)

135.167(c)

135.173 No reference to IFR flight

135.179 MEL

135.180 should include Helicopters

135.201 should reference 91 like 135.61

135.209 delete

135.221 should reference 91.169

135.223 should reference 91.167

135.225 should have the verbiage used in AC90-1.

135.297 reword the requirement for a circling approach to (other than helicopters) one circle to land maneuver from circling minimums.